

JASON DENT,  
plaintiff,

Civil No. \_\_\_\_\_

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5/21/2020

v.

WILLIAM BARR, JOHN F. CARAWAY,  
Defendant.

#### EMERGENCY INJUNCTION

Plaintiff Jason Dent files this emergency injunction for a order from the Honorable Court for defendants U.S. Attorney General William Barr and BOP South Central Regional Director J.F. Caraway to cease; (1) the spending of more money on private prisons, Cease; (2) the spending of less money on BOP operated facilities, Cease; (3) the current policies.

#### Jurisdiction

This emergency injunction falls under your jurisdiction because South Central Regional Director J.F. Caraway office falls under the jurisdiction of this Honorable Court.

#### Statement of Facts

1. In April 2008, just weeks before the race riot at U.S.P. Florence occurred, Phil Glover, a legislative coordinator with the AFFF, testified before Congress about rising levels of violence in the BOP. Glover blamed the violence on insufficient staffing and resources. (EX-1)

2. On April 20, 2008, a major 30 minute race riot at the U.S.P. in Florence, Colorado broke out. To quell the riot, guards fired more than 200 M-16 rounds, 300 pepper balls and almost a dozen tear gas canisters, plus sting grenades. Two prisoners, Brian Scott Kubik and Phillip Lee Hooker, were shot to death by tower guards; 30 prisoners and one staff member were also injured. (EX-1)

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3. In a March 2008 memo, BOP prison officials estimated that a projected \$289 million budget shortfall could force the cutting of guard positions to the point where safety and security of staff and inmates could be in jeopardy. (EX-1)

4. To cut costs the BOP removed the Unicor (making inmates unable to pay Court fines and restitutions), removed the washers and dryers (which increased the staph infections 100%), removed the microwaves, removed breakfast off the menu and replaced it with gran flakes seven days a week, serving inmates peanut butter and jelly or sandwich meat for dinner, lack of jobs, lack of food.

5. These policies have created a ultra violent environment, 2008; 13 inmate murders and 1 correctional officer, 2009; 6 inmate murders, 2010; 16 inmate murders, 2011; 8 inmate murders, 2012; 5 inmate murders, 2013; 8 inmate murders and 1 correctional officer murder, 2014; 13 inmate murders, 2015; 13 inmate murders, 2016; 5 inmate murders. (EX-1), (EX-2).

6. There was never any budget cuts to the private prisons. In the year 2014 the BOP paid private prisons Adams County \$62 million (EX-3), Big Spring CI \$82 million (EX-4), Folkston-DRT \$56 million, Car \$70 thousand, Cibola County \$28 million, Dalby CI \$35 million, Eden \$33 million, McRae \$37 million, Moshannon Valley CI \$44 million, North East Ohio Correction Center \$39 million, Reeves \$51 million, Reeves DC \$22 million, Rivers/Winston \$39 million, Taft \$44 million, USMS/FPD \$4 million, Willacy CI \$49 million.

7. In the year 2015 the BOP paid private prisons Adams County \$60 million (EX-5), Big Spring CI \$80 million, Folkston-DRT \$58 million, Cibola County \$29 million,

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Dalby CI \$35 million, Eden \$30 million, Great Plains CC \$6 million, McRae \$36 million, Moshannon Valley \$43 million, North East Ohio Correction Center \$24 million, Reeves DC \$21 million, Rivers/Winton \$39 million, Taft \$44 million, Willacy CI \$18 million, Willacy Disturbance \$108 thousand.

8. In the year 2016 the BOP paid private prisons Cibola County \$30 million, Dalby CI \$35 million, Eden \$31 million, Great Plains \$33 million, McRae \$37 million, Moshannon Valley \$41 million, Reeves DC \$19 million, Rivers/Winton \$38 million, Taft \$45 million.

9. On January 29, 2018, BOP Assistant Director Frank Lara leaked a memo (EX-6) which states; "Trump Admin to Boost Use of Private Prisons While Slashing Federal Staff". To accomplish this goal the BOP cut the Halfway House placement of inmates which keeps the BOP facilities packed over capacity which justifies their (BOP) reasons for placing BOP inmates in private prisons which was the BOP plan since 2008 (compare paragraphs 1, 2, 3 and 9).

10. As this Honorable Court can see rehabilitation is not the BOP goal for inmates anymore only warehousing.

Based on the above a emergency injunction is required.

Dated: May 21, 2019

CC: HONORABLE WILLIAM BARR  
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U.S. DEPARTMENT OF JUSTICE  
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WASHINGTON, DC 20530

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~~Respectfully Submitted~~

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Plaintiff,

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Defendant.

JURISDICTION

The attached emergency injunction is being filed against the Federal Bureau of Prisons South Central Regional Director whose office below should fall under the jurisdiction of this Honorable Court, if not I respectfully request that the emergency injunction be transferred to the appropriate Court.

SOUTH CENTRAL REGIONAL OFFICE  
FEDERAL BUREAU OF PRISONS  
U.S. ARMED FORCES RESERVE COMPLEX  
344 MARINE FORCES DRIVE  
GRAND PRAIRIE, TEXAS 75051

Dated: May 21, 2019

Respectfully Submitted

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